UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:	)	CHAPTER 13
	)	
MARK CHRISTIAN,	)	CASE NO. **19-56979-sms**
	)	
Debtor.	)	JUDGE SIGLER

- -

NOTICE OF PLEADING, DEADLINE TO OBJECT AND HEARING ON MOTION TO SUSPEND CHAPTER 13 PLAN PAYMENTS

PLEASE TAKE NOTICE that the Debtor, MARK CHRISTIAN, filed a Motion to Suspend Chapter 13 Plan Payments on May 14, 2020. Pursuant to General Order No 24-2018, the Court may consider this matter without further notice or a hearing if no party in interest files a response or objection within twenty-one (21) days from the date of service of this Notice. If you object to the relief requested in this Pleading, you must timely file your objection with the Bankruptcy Clerk at U.S. Bankruptcy Court:
Clerk, United States Bankruptcy Court, Rm 1340, 75 Ted Turner Dr. SW, Atlanta, GA 30303; and serve a copy on Movant's attorney: Susan Blum, Ginsberg Law Offices, 1854 Independence Square, Atlanta, GA 30338, and any other appropriate persons by the objection deadline. The response or objection must explain your position and be actually received by the Bankruptcy Court within the required time.

A hearing on the Pleading has been scheduled for June 16, 2020, 10:00 a.m. in the U.S. Courthouse, Courtroom 1201, 75 Ted Turner Dr. SW, Atlanta, GA 30303. If an objection or response is timely filed and served, the hearing will proceed as scheduled. **If you do not file a response or objection within the time permitted, the Court may grant the relief requested without further notice or hearing** provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If not objection is timely filed, but no order is entered granting the relief requested at least one business day prior to the hearing, the hearing will be held at the time and place scheduled.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Given the current public health crisis, hearings may be telephonic only. Please check the "Important Information Regarding Court Operations During COVID-19 Outbreak" tab at the tope of the GANB Website http://www.ganb.uscourts.gov/ prior to the hearing for instructions on whether to appear in person or by phone.

Respectfully submitted on May 14, 2020

By: /s/ Susan S. Blum
Susan S. Blum
Attorney for Debtor
Georgia Bar 111315

GINSBERG LAW OFFICES, P.C.
1854 Independence Square
Atlanta, GA 30338
(770) 393-4985
blumlawfirm@gmail.com

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MOTION TO SUSPEND CHAPTER 13 PLAN PAYMENTS

COMES NOW Debtor, MARK CHRISTIAN, in the above-styled case and show this Honorable Court the following:

1.

This case was originally filed as a Chapter 13 bankruptcy on May 4, 2019. The 341 meeting was held on June 6, 2019, and the Chapter 13 Plan was confirmed on September 24, 2019.

2.

The confirmed Chapter 13 Plan provides for payments of $1,033 per month.

3.

Debtor's plan payments are current through the date of this Motion.

4.

Debtor was employed as a Registered Nurse (RN) with Trustaff, a healthcare staffing agency.

5.

Debtor had been working as a contract RN at the University Heath Care Hospital in Augusta, Georgia during the months of March and April and into May, as a result of the Covid-19 pandemic.

6.

Debtor's contract with Trustaff was severed, his position at the hospital rescinded, and he is no longer working there, as of May 5, 2020. At the present time, Debtor has $0 household income. This drastic reduction of income creates a substantial hardship for Debtor.

7.

In the event that the requested payments are suspended, Debtor will modify the Plan if necessary. Under the CARES Act, this Plan is eligible to be paid out over 84 months after the first payment was due if the Plan was confirmed prior to the enactment of the law.

8.

Based on the above facts, Debtor is requesting a suspension of Chapter 13 Plan payments for June 2020, July 2020, and August 2020.

WHEREFORE, Debtor prays:

(a) That this Motion to Suspend Chapter 13 Plan Payments be filed, read and considered;
(b) That the Plan payments be suspended for June, July and August 2020;
(c) That this Honorable Court grant such other and further relief as it may deem just and proper.

Date: May 14, 2020.

Respectfully submitted,
GINSBERG LAW OFFICES, P.C.

by: /s/ Susan S. Blum
Susan S. Blum
GA Bar No. 111315

1854 Independence Square
Atlanta, GA 30338
770-393-4985
blumlawfirm@gmail.com

VERIFICATION

I, MARK CHRISTIAN, Debtor in the above-styled Chapter 13, case certify that the assertions contained in the foregoing Motion is true and correct to the best of my knowledge.

Date: May 14, 2020.

Debtor: /s/
Mark Christian

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CERTIFICATE OF SERVICE

I, Susan S. Blum, certify that I served a copy of Debtor's Notice of Pleading, Deadline to Object and for Hearing on Motion to Suspend Chapter 13 Plan Payments; and Motion to Suspend Chapter 13 Plan Payments upon the following parties by U.S. Mail, with adequate postage thereon, by email, electronically through the CM/ECF Noticing System addressed to the following, or sending by Certified Mail addressed to an officer of an insured depository institution:

Mark Christian
624 Victoria Lane
Woodstock, GA 30189

Chapter 13 Trustee, *via ECF*
Mary Ida Townson
191 Peachtree Street, NE, Ste 2200
Atlanta, GA 30303

U.S. Trustee, *via ECF*
75 Ted Turner Drive, Suite 362
Atlanta, GA 30303

Daniela Abraha Hinds (POC 1), *via e-mail*
32 Muncy Ct, SE
Smyrna, GA 30080
danielaabraha@hotmail.com

Kathryn C. Reeder (POC 5), *via email*
Special Assistant Attorney General
Canton Division Child Support Services
PO Box 218
Holly Springs, GA 30142
cantoncse@dhs.ga.gov; *kathrynreeder@reederlawfirm.com*

Jennifer Christian (POC 8), *via email*
12060 Cavell Street
Livonia, MI 48150
jentiki@hotmail.com

Nationstar Mortgage LLC d/b/a Mr. Cooper
Attn: Bankruptcy Dept. (POC 6)
PO box 619096
Dallas, TX 75261-9741

Nationstar Mortgage LLC d/b/a Mr. Cooper
Taylor S. Mansell (POC 6), *via email*
Shapiro Pendergast & Hasty LLP
211 Perimeter Center Pkwy, NE, Ste 300
Atlanta, GA 30346
tmansell@LOGS.com

AND TO ALL CREDITORS ON ATTACHED MAILING MATRIX

Executed on May 14, 2020

By: /s/ Susan S. Blum
Susan S. Blum
Attorney for Debtor
Georgia Bar 111315

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Atlanta, GA 30338
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